

1  
2                   IN THE UNITED STATES DISTRICT COURT  
3                   FOR THE MIDDLE DISTRICT OF TENNESSEE

4 MARGARET CRAIG, as next of )  
5 kin and personal )  
6 representative of the )  
7 estate of Angela Hulsey, )  
8                   Plaintiff, )  
9                   vs. ) Docket No.:3:17-cv-01335  
10 CHEATHAM COUNTY, TENNESSEE, ) JUDE CAMPBELL/  
11 BEN MOORE; MARK BRYANT; ) MAGISTRATE JUDGE HOLMES  
12 STEPHANIE GIZZI-BELL, )  
13 JESSICA PLANK, KEITH ) JURY DEMAND  
14 PFEIFFER; MICHAEL )  
15 MONTGOMERY; JUSTIN PAUL; )  
16 BRANDON REASONOVER; TASHA )  
17 BIGGS; HARLEY GEROW; JOSH )  
18 MARRIOTT; JEFFREY GOAD; )  
19 JUDY KING; ROGER TEMPLE; )  
20 JEFF KEY; and JAMES BARNUM, )  
21                   Defendants. )

22  
23                   **THE DEPOSITION OF MS. TIA ALEXIS NEWMAN**

24                   January 9, 2019

25                   SCHAFFER REPORTING SERVICE  
                    JILL A. SCHAFFER, RPR  
                    P.O. Box 3214  
                    Jackson, Tennessee 38303  
                    (731) 668-6880

1       A     Yeah. But I was in Big Dorm.

2       Q     Okay. And when you saw her come in, do you

3       remember if she looked any different than you'd seen

4       her on prior occasions?

5       A     Oh, yeah. Yes, she definitely looked different.

6       She had this -- it was, like, a -- I could tell

7       something was wrong with her whenever she come in. She

8       had, like, a grayish-greenish look to her anyways, and

9       she looked like she -- she was real little. She had

10      lost some weight.

11           And her face was, like, kind of droopy. Her right

12      side of her face was, like, kind of (indicating). I

13      could tell because I know her. I -- I mean, I could

14      just tell her face was, like -- you could tell -- she

15      told me that she had had a stroke.

16      Q     Okay. So do you know -- were you able to see her

17      on the first day she came in and had that

18      conversation --

19      A     No.

20      Q     -- or was that later?

21      A     Yeah. That was -- they only keep you up in

22      booking for, like, probably two or three days. So she

23      was up there for two or three days, and then they

24      brought her to the back.

25      Q     Okay. So when they brought her to the back, that

1 was the first time you saw her.

2 A Yes.

3 Q Okay.

4 A (The witness nodded.)

5 Um-hum.

6 Q And when you said she was gray --

7 "grayish-greenish anyway," do you mean before this

8 occasion she had been kind of grayish-greenish or --

9 A I mean, as soon as she walked in, you -- I mean --

10 I don't know. The officers -- I just believe that they

11 should have -- they should have sent her out to the

12 hospital anyway.

13 Q Okay.

14 A I mean, you could look at her and tell something

15 was wrong, like something was going wrong with her.

16 Q Okay. And so when you say that you knew something

17 was -- you knew something was wrong with her, is that

18 based on the things that you just told me about?

19 A Yeah, because I know who she is on the outside.

20 And whenever she come in -- as soon as she come in, I

21 mean, you could just tell she was sick. She was sick.

22 She should have got medical treatment then.

23 Q Okay.

24 A I'm not even sure if the nurse seen her before she

25 come back -- and they're supposed to see you before you

1 Q Okay. You mean you have to have those treatments  
2 before you're moved to the back.

3 A Uh-huh. Yeah.

4 Q Okay. So when Ms. Hulsey came to the back and  
5 she -- and she looked ill -- you talked about her  
6 color, her weight loss, and her face --

7 A (The witness nodded.)  
8 Um-hum.

9 Q -- being droopy. You said her right side, and you  
10 indicated -- kind of indicated her mouth.

11 A Yeah.

12 Q Is that --

13 A It --

14 Q -- where you --

15 A It was --

16 Q -- noticed the droop?

17 A Uh-huh. Yeah.

18 But -- and I had asked her what happened. She  
19 told me she had had a stroke.

20 Q Okay. Other than those three things that we just  
21 talked about, was there anything else about her  
22 appearance that made you think she was sick?

23 A No, not whenever I first seen her. Now, whenever  
24 I got around her, I could tell more that she was sick  
25 because she was using the bathroom all over herself. I

1 was having to help bathe her in the shower. She was so  
2 weak she couldn't even brush her hair out. I had to  
3 brush her hair out for her.

4 Q Okay. So when you -- when you saw her, she  
5 indicated to you that she had not seen anybody in  
6 medical yet?

7 A Uh-huh. That's what she told me.

8 Q And if -- if you want to see somebody in medical,  
9 do -- is there any way that you get on a list or get to  
10 see the nurse?

11 A Oh, I mean --

12 Q How does that happen?

13 A -- you write out on the kiosk that's in the --  
14 that's in the dorm, and usually you're seen, like, the  
15 next day unless she's got a long list, and it might be  
16 a couple of days.

17 Q Okay. And so did Ms. Hulsey make any attempt to  
18 fill out the kiosk?

19 A I can't say. I'm not sure if she did or not.

20 Q Okay. Did -- do you know if she ever requested  
21 any medical treatment?

22 A Yeah. She -- now, she told the officers numerous  
23 times that she did not feel right. She kept telling  
24 them, "I feel like I'm dying." And Harley -- Miss  
25 Harley was the one that -- was one of the ones that was

1       there.

2               I don't know Harley's last name, but she told her  
3       several times -- because Angela's bed was right beside  
4       mine. Angela was in a boat -- in a boat right beside  
5       my bunk. I was in a bunk, and she was in a boat beside  
6       the toilet and the shower.

7               And she kept telling Harley that -- she said, "I  
8       feel like I'm dying. I feel like I'm dying." And  
9       Harley just kept blowing her off. She said -- this was  
10      her exact words. She said, "You just feel like you're  
11      dying. You're not dying. You just feel like you are."

12              And any of the other officers would just tell  
13      you -- because this is what the nurse tells them to  
14      tell us, I believe, is to "Drink water and lay down,  
15      and you'll feel better."

16      Q       Okay. So is that what Ms. Hulsey was told?

17      A       I can't say yes or no, but I -- I mean, I believe  
18      so. I would say so because that's what every inmate is  
19      told, I mean, honestly.

20              If something going wrong, the main answer they  
21      come up with is "Drink water and lay down." But they  
22      should have been able to look at her and tell. They --  
23      they just should have gave her medical treatments.  
24      It's a shame they didn't.

25      Q       Okay. And so when -- do you remember when that

1 was that she said something to Miss Harley?

2 A Do I remember when?

3 Q Yeah. How many days she'd been in the -- in the  
4 back.

5 A No. I'm not sure.

6 Q Do you remember how long she was in the back with  
7 you?

8 A Now, I know she was only there for -- on a  
9 misdemeanor charge. And that -- you're no -- you're  
10 not there longer than a week on a misdemeanor charge  
11 usually unless you go to court and they put you off.

12 But I believe she might have been back there with  
13 me probably three or four days.

14 Q Okay. So do you remember her telling anyone else  
15 besides Miss Harley that she felt like she was dying or  
16 didn't feel well?

17 A She told Mark. Now, I don't know Mark's last  
18 name. I think it may be Bryant. I can't remember.  
19 He's the one that got indicted for tasing that boy or  
20 whatever.

21 Q Okay. And so -- and you know it was Mark because  
22 you knew his name?

23 A Yeah. Harley called him back there one night. I  
24 can't tell you the exact night, but that night that she  
25 kept saying, "I feel like I'm dying; I feel like I'm

1       dying," she had went -- okay.

2               They -- Harley come back there with the blood  
3       pressure cuff, not the nurse. Harley did. She brought  
4       it back there because Angela said she didn't feel good  
5       and she felt like she was dying.

6               They -- Harley was doing her blood pressure on her  
7       left arm, sitting at the table at Big Dorm. And she  
8       started having a seizure, like, and her tongue was  
9       stuck out. She couldn't -- she could not put her  
10      tongue back in her -- in her mouth.

11              And Harley -- Harley was, like, "Y'all catch her."  
12      So me and Deanna Briscoe ran around the table to catch  
13      her from falling, which that's not even our job, for  
14      one. I mean, she was going to fall back in the floor.  
15      She was seizing out.

16              And Harley called Mark on the radio, I'm guessing,  
17      because he come back there. And by that time Angela  
18      had kind of came to, and she was sitting up, but her  
19      tongue was still sticking out.

20              Mark made the comment, he was, like -- he said,  
21      "Put your tongue back in your mouth and go lay down."  
22      He said, "We're going to get you took care of." That's  
23      what he said. And if y'all have camera footage, y'all  
24      can pull it back and see that that's what happened.

25      Q       Okay. So you said --



1 A And then Mark told us to get out of the way. Mark  
2 was, like, "And y'all need to move, get out of the  
3 way." And then that's whenever I was, like, "Well, if  
4 it wasn't for me and Deanna, she would have fell back  
5 in the floor because Harley didn't run over here to get  
6 her."

7 Q Okay. So let me break this down a little bit. So  
8 Harley -- you said when she was telling Harley that she  
9 was dying --

10 A Uh-huh.

11 Q -- Harley went and got the --

12 A Blood pressure cuff.

13 Q -- blood pressure cuff and was taking her blood  
14 pressure.

15 A (The witness nodded.)

16 Uh-huh.

17 Q Do you remember if this was evening or --

18 A Harley is second shift, so yeah, it was somewhere  
19 between two in the afternoon and ten at night.

20 Q Okay. So do you know if the nurse was still  
21 there?

22 A I'm not sure if the nurse was there or not.

23 Q Okay. So Harley went and got the blood pressure  
24 cuff. Do you remember if she actually completed her  
25 blood pressure?

1 A (The witness shook her head.)

2 I can't remember because whenever she put it on  
3 her arm -- and it was, like -- because it's one of them  
4 push -- push ones, whenever it was doing it, she  
5 started having a seizure. So I can't -- I can't really  
6 remember.

7 Q Okay. So -- and when you say she started having a  
8 seizure --

9 A Um-hum.

10 Q -- what exactly was she doing? Can you describe  
11 that?

12 A Well, her body was shaking. She was, like, going  
13 backwards because it's, like, a table like this  
14 (indicating) except for there's a bench part to it.  
15 And, like, she was just shaking, and she started  
16 falling backwards.

17 And that's when Harley was, like, "Somebody catch  
18 her." And then that's whenever me and Deanna ran  
19 around and caught her.

20 Q Okay. And then you think -- but you didn't see --  
21 Harley called Mark Bryant.

22 A Yeah. Yeah, that's what I'm saying. I don't  
23 know -- I mean, I guess she had to have called him on  
24 the radio because, you know, you can't have phones back  
25 there or anything. So I'm guessing she radioed him and

1 told him to come back.

2 Q Okay. Well, did y'all have -- is there any kind  
3 of call button in the cell where she could have used  
4 that to call --

5 A Yeah. Now, that's right. Yeah, there is a push  
6 button right by the door. She could have hit that, but  
7 I'm not sure.

8 Q Okay. But for -- regardless, Mark Bryant  
9 responded and came back --

10 A (The witness nodded.)  
11 Uh-huh.

12 Q -- to the cell.

13 And you said at that point -- where -- where  
14 exactly was Mrs. Hulsey at that time?

15 A She was still sitting at the table. She had kind  
16 of like come to a little bit right before he come back  
17 in there, but her tongue was still sticking out of her  
18 mouth. It was -- I don't know. I guess it was stuck.  
19 I'm not sure.

20 Q Okay. So -- and then did Ms. Hulsey say anything?

21 A No. She was just -- she -- it's like she wasn't  
22 there. It was -- it was the weirdest thing. I don't  
23 know.

24 Q Okay. And so did Harley or Mark Bryant examine  
25 her and start -- look at her in any way? I know you

1       said he took her -- put her tongue back in her mouth.

2       A     Yeah.

3       Q     But did he look at her or do anything else?

4       A     (The witness shook her head.)

5       I'm not sure.

6       Q     Okay. Did you hear any of the conversation

7       between, like, Harley and Mark as to what had happened?

8       A     No.

9       Q     Okay. Did you or -- I'm sorry. Was it Deanna?

10      Was that the other --

11      A     (The witness nodded.)

12      Deanna Briscoe, uh-huh.

13      Q     Okay. Did either of you talk to Mark Bryant about

14      what had happened?

15      A     No. Mark told us to get out of the way whenever

16      he come back there because me and Deanna were still

17      standing behind her, standing behind Angela, in case,

18      you know, she fell backwards. And Mark was, like,

19      "Move out of the way."

20      Q     Okay. And so when -- when he told Ms. Hulsey to

21      put her tongue back in her mouth and to -- and I'm

22      sorry. I don't want to put words in your mouth, but

23      did you say to go lie down?

24      A     Yeah. He told her to put her tongue back in her

25      mouth and go lay down.